

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Travis M. Allred	:	Case No.: 17-13198(MDC)
Lauren M. Allred	:	
	:	
Debtor (s)	:	Chapter 13

MOTION TO INCUR NEW DEBT

COMES NOW, Travis and Lauren Allred, hereinafter referred to as “Debtors”, by and through their undersigned counsel, respectfully moves this Honorable Court for an Order Allowing Debtor to Incur New Debt and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about May 4, 2017.
2. The Chapter 13 filing was assigned case number 17-13198-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about February 1, 2018.
4. Debtors are desirous of refinancing their real property known as and located at 1706 Justin Lane, Paoli, PA 19301.
5. Upon approval of the refinance the debtor will take any cash-out amount to pay off the remaining balance of the Chapter 13 Plan.
6. At the time of filing the instant Motion, the Debtors are current on their obligations to the Chapter 13 Trustee.
7. In consideration thereof, Debtor requests this Honorable court to enter an order allowing the Debtors to incur new debt to re-finance their home and as a result pay and remaining balance due and owing under the Chapter 13 Bankruptcy.

WHEREFORE, the Debtors request an Order allowing them to incur new debt to refinance real property and use the cash-out payment to pay off the Chapter 13 Plan balance.

Dated: September 10, 2020

/s/Brad J. Sadek, Esq
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